## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re RENAISSANCERE HOLDINGS LTD.

SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

ALL ACTIONS.

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR DISTRIBUTION OF NET SETTLEMENT FUND

## TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE, that, the undersigned hereby move this Court, before the Honorable William H. Pauley, United States District Judge, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (i) approving the administrative determinations of A.B. Data, Ltd's Class Action Administration Division ("A.B. Data"), the claims administrator for the Settlement, accepting and rejecting claims submitted herein; (ii) directing payment of \$51,198.45 out of the Settlement Fund to A.B. Data for the balance of its fees and expenses incurred and to be incurred in connection with services performed and to be performed with respect to the administration and distribution of the Settlement Fund; (iii) directing distribution of the Net Settlement Fund, after deduction of the payments requested herein, to Class Members whose Proof of Claim and Release forms ("Proofs of Claim") have been accepted and whose pro rata share of the Net Settlement Fund is \$10.00 or more; (iv) approving the plan for re-distribution of any funds remaining in the Net Settlement Fund following the distribution to Class Members; (v) authorizing destruction of paper copies of Proofs of Claim forms and all supporting documentation one year after the final distribution of the Net Settlement Fund, and authorizing destruction of electronic copies of claim records three years after the final distribution of the Net Settlement Fund; and (vi) for such other and further relief as this Court deems appropriate. Lead Plaintiffs' motion is based upon the annexed Affidavit of Michelle M. La Count Esq. of A.B. Data, the Joint Declaration of Michael K. Yarnoff of Barroway Topaz Kessler Meltzer & Check, LLP and Ellen Gusikoff Stewart of Coughlin Stoia Geller Rudman & Robbins LLP, on behalf of Co-Lead Counsel, and upon all other pleadings and matters herein.

DATED: January 1/2, 2010

Respectfully Submitted,

COUGHLIN STOIA GELLER **RUDMAN & ROBBINS LLP** DARREN J. ROBBINS

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Co-Lead Counsel for Lead Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify, that on January 20, 2010, I caused the foregoing Lead Plaintiffs' Notice of Motion and Motion for Distribution of Net Settlement Fund to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART